

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

**IN RE: ASBESTOS PRODUCTS  
LIABILITY LITIGATION**

MDL DOCKET NO. 875

**MARTHA ADAMS spouse and personal  
representative for the ESTATE OF  
CHARLES ADAMS, deceased, et al., vs.  
ASBESTOS DEFENDANTS,  
ALBANY INTERNATIONAL, et al.,**

IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA

MARTHA ADAMS spouse and personal  
representative for the ESTATE OF  
CHARLES ADAMS, deceased, et al.,

Plaintiffs,

vs.

CIVIL ACTION NO.  
2:07-cv-01064-WKW-TFM

ASBESTOS DEFENDANTS,  
ALBANY INTERNATIONAL, et al.,

Defendants.

**JOINDER AND ADOPTION IN AMERICAN OPTICAL CORPORATION'S MOTION  
TO DISMISS, OR, IN THE ALTERNATIVE, MOTION FOR MORE DEFINITE  
STATEMENT AND/OR MOTION FOR SEVERANCE**

COME NOW Defendants Union Carbide Corporation, Foseco, Inc., CertainTeed Corporation, ArvinMeritor, Inc., Maremont Corporation and Bayer Cropscience, Inc. F/K/A Aventis Cropscience USA, Inc. (F/K/A Rhone Poulenc Ag Company, Inc. F/K/A Rhone Poulenc, Inc., F/K/A Union Carbide Agricultural Products, Inc. F/K/A Amchem Products, Inc., A Successor To Benjamin Foster Company), incorrectly sued as Bayer Cropscience, Inc.,

individual and as successor to Aventis Cropscience USA, Inc. f/k/a Rhone Poulenc Ag Co. , f/k/a Amchem, Products, Inc., Benjamin Foster Co., and hereby join in and adopt as though fully set forth American Optical Corporation's Motion to Dismiss, or, in the Alternative, Motion for More Definite Statement and/or Motion for Severance filed herein on January 29, 2008.

WHEREFORE, for all the arguments, citations to authority and for all other grounds the court deems applicable, Defendants Union Carbide Corporation, Foseco, Inc., CertainTeed Corporation, ArvinMeritor, Inc., Maremont Corporation and Bayer Cropscience, Inc. F/K/A Aventis Cropscience USA, Inc. (F/K/A Rhone Poulenc Ag Company, Inc. F/K/A Rhone Poulenc, Inc., F/K/A Union Carbide Agricultural Products, Inc. F/K/A Amchem Products, Inc., A Successor To Benjamin Foster Company) respectfully request this Honorable Court to grant American Optical Corporation's Motion to Dismiss, or, in the Alternative, Motion for More Definite Statement and/or Motion for Severance filed herein and to further grant all additional relief this Honorable Court deems necessary and proper.

Respectfully submitted this 18th day of March, 2008.

**HAWKINS & PARNELL, LLP**

/s/ Evelyn M. Fletcher

Evelyn M. Fletcher (FLE 019)

AL Bar No. ASB-1485-C19E

Elizabeth B. Padgett (PAD015)

Alabama Bar No. ASB-3936-C60P

Counsel for Bayer Cropscience, Inc., Foseco, Inc., ArvinMeritor, Inc., Maremont Corporation, CertainTeed Corporation and Union Carbide Corporation

4000 SunTrust Plaza  
303 Peachtree Street, N.E.  
Atlanta, GA 30308-3243  
404/614-7400

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this date served the foregoing on all counsel by electronic filing and served Plaintiffs' counsel at the following address by U. S. Mail, with proper postage affixed:

G. Patterson Keahey, Jr.  
Law Offices of G. Patterson Keahey, P.C.  
One Independence Plaza, Suite 612  
Birmingham, AL 35209

This 18<sup>th</sup> day of March, 2008.

**HAWKINS & PARNELL, LLP**

/s/ Evelyn M. Fletcher  
Evelyn M. Fletcher (FLE019)  
AL Bar No. ASB-1485-C19E  
Elizabeth B. Padgett (PAD 015)  
Alabama Bar No. ASB-3936-C60P

Counsel for Bayer Cropscience, Inc., Foseco,  
Inc., ArvinMeritor, Inc., Maremont Corporation,  
CertainTeed Corporation and Union Carbide  
Corporation

4000 SunTrust Plaza  
303 Peachtree Street, N.E.  
Atlanta, GA 30308-3243  
404/614-7400